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September 8, 2025

Minnesota Pollution Control Agency

Corrie Layfield

520 Lafayette Rd.

Saint Paul, MN 55155

Re: Minnesota Nutrient Reduction Strategy 2025 update

Dear Ms. Layfield:

We appreciate the opportunity to provide feedback on the 2025 update of the Minnesota Nutrient Reduction Strategy. As a coalition of over 80 permitted MS4s, MCSC represents a diverse group of municipalities across the state with a strong commitment to effective stormwater management and extensive experience implementing pollutant reduction activities through the MS4 permit and local programs.

The Nutrient Reduction Strategy notes that urban areas account for a small portion of the nutrient load to the state's major water resources. The primary contributors are agricultural and rural runoff, which are the key nutrient sources across most of the state.

As the state moves forward with nutrient reduction initiatives, it may be tempting to push for nutrient reductions from already regulated areas. However, it's important to note that current regulatory programs are primarily focused on urban and wastewater nutrient sources which contribute less to the nutrient load in the state's major water resources. In particular, regulated MS4s contribute a small fraction to the total nutrient load. Targeting nutrient reduction efforts toward agricultural and rural runoff will have the most substantial impact.

Therefore, to make significant gains in nutrient reduction across the state,

MCSC encourages the state to prioritize its nutrient reduction efforts toward these larger sources—agricultural and rural runoff—to achieve measurable and cost-effective outcomes and avoid additional regulation of smaller contributors including the state’s MS4s.

Respectfully,

A handwritten signature in black ink that reads "Elizabeth Stout". The script is cursive and elegant, with the first letter of each word being capitalized and prominent.

Elizabeth Stout, Chair MCSC Steering Committee

Minnesota Cities Stormwater Coalition